

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA  
*ex rel.* DANIEL MOY,

Plaintiff,

v.

A C PHARMACY CORP., JENNAN  
COMPREHENSIVE MEDICAL, P.C.,  
MAGGIE CHEN, AMANDA Y. HON,  
JOHN HON, SI CI ZHU, JOHN DZAAN-  
HONG CHING, WISELY LIU,  
FLORENCE MUI, HENRY CHEN, M.D.,  
YANHAN HUANG, M.D., JOHN YIU,  
M.D., TINA WONG, M.D., PUI-CHING  
MAK, QING XIANG HUANG; XING LIAN  
CHEN, JACKY LEE, and  
RICHARD SHADRIN,

Defendants.

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**STIPULATION AND ORDER**

Civil Action No. 15-CV-5486

(Gonzalez, J)  
(Merkel, M.J.)

WHEREAS, on or about September 22, 2015, Daniel Moy (the “Relator”) filed the above-referenced action, in which Relator asserted claims on behalf of the United States pursuant to the *qui tam* provisions of the False Claims Act, 31 U.S.C. §§ 3729-33 (the “FCA”);

WHEREAS, in accordance with 31 U.S.C. § 3730(b), Relator’s complaint was sealed for a period of at least sixty days from the date of filing;

WHEREAS, the Court partially unsealed the action on September 3, 2024;

WHEREAS, the Court most recently extended the intervention deadline until February 26, 2025;

WHEREAS, in order for the United States to have time to adequately investigate

and evaluate the allegations contained in Relator's complaint, the United States, with the consent of Relator's counsel, respectfully requests that its time to intervene in this action be extended until further order of the Court, and at least until August 26, 2025;

WHEREAS, in the interests of judicial economy, and to ensure consistency with the federal deadline, the United States respectfully requests that the extension of the intervention deadline also be deemed for the benefit of the State of New York;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel for Relator and the United States that:

1. In order to allow the United States time to investigate and evaluate the allegations contained in Relator's complaint, the United States shall have until further order of the Court, and at least until August 26, 2025, to determine whether to elect to intervene in the above-captioned *qui tam* action.

2. The extension shall be deemed for the benefit of the State of New York as well as for the United States.

Dated: Brooklyn, New York  
February 25, 2025

JOHN J. DURHAM  
UNITED STATES ATTORNEY  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

By: /s/ Tsz Ting Tam  
Tsz Ting Tam  
Assistant U.S. Attorney  
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Dated: New York, New York  
February 25, 2025

ALLEGAERT BERGER & VOGEL LLP  
111 Broadway, 20<sup>th</sup> Floor  
New York, New York 10006

By: /s/ John S. Craig  
John S. Craig  
(212) 571-0550

SO ORDERED:

Brooklyn, New York  
February 25, 2025

/s/ Hector Gonzalez  
HECTOR GONZALEZ United States  
District Judge, E.D.N.Y.